

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO</b> <i>All Ethicon Wave 11 cases listed in Exhibit A</i>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**PLAINTIFFS’ MOTION TO LIMIT THE OPINIONS AND TESTIMONY  
OF DEFENSE EXPERT LAWRENCE LIND, M.D.**

Plaintiffs respectfully request that the Court limit the opinions and testimony proffered by Defendants’ expert Lawrence Lind, M.D. (“Dr. Lind”), pursuant to Federal Rule of Evidence 702. Primarily, Plaintiffs’ motion seek to preclude Dr. Lind’s opinions that go beyond his expertise, and to preclude him from testifying about personal complication rates from his practice. The details supporting this motion are laid out in a Memorandum in Support. The motion is further supported by the following exhibits, which are attached hereto:

**Exhibit A:** List of cases on which Dr. Lind is designated in Wave 11

**Exhibit B:** Rough draft transcript of Dr. Lind’s deposition, taken August 7, 2019

**Exhibit C:** Dr. Lind’s Expert Report

**Exhibit B:** Dr. Lind’s Curriculum Vitae

**Dated:** August 15, 2019

Respectfully submitted,

/s/Thomas P. Cartmell

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing document on August 15, 2019, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/Thomas P. Cartmell

**Attorney for Plaintiffs**